EXHIBIT 2

SWORN STATEMENT OF COREY DAUGHERTY

- 1. My name is Corey Daugherty. I am over the age of 21 and have personal knowledge of the contents of this statement.
- 2. CRC makes money by selling insurance policies. The employees who make the most money are the brokers who sell the most insurance policies. The way CRC does this is by acting as a broker and by building relationships with insurance agencies. The insurance agencies call on CRC when they have a client (a prospective insured) who needs a policy. CRC markets the request from the client and obtains multiple quotes from different insurance companies. When an insured selects a policy, the insurance company pays a commission to CRC which is split with the client insurance agency. CRC's revenue comes exclusively from those commissions.
 - 3. The goal of the production teams is to generate commissions by placing policies.
- 4. As a broker in training on Betsy Barnett's team, I performed support functions for her accounts including quoting, binding, and issuing endorsements. I spent countless hours learning various coverages with the intention of becoming a successful broker.
- Yvette Talsma was an account executive on Barnett's team when I joined CRC.
 Talsma had been working on the production side of CRC since before I joined CRC.
- 6. After I was on Betsy's team approximately five or six years, Talsma began assisting me with the business I had developed. Before then, I was expected to continue learning the business and travel and generate business while working my accounts start to finish.
- 7. In my experience, it generally takes at least 4 or 5 years before a broker can expect to have support. Doing your own work in those years is critical to learning the business.
 - 8. Talsma moved to my team when I started my own Team in 2009.

- 9. After approximately four years of my Team experiencing revenue growth, Andrea Sutton joined my Team as an account executive in February 2013. At that time Sutton had nearly two decades of experience on the production side of CRC.
- 10. The primary distinguishing factor between the roles on a production team is the requirement of bringing in new business and the responsibility for ensuring that an insured is sold appropriate coverage which requires in-depth knowledge of policy terms, potential claims, and various coverages. Failure to sell a policy with the appropriate terms may result in an errors and omissions claim against the broker and CRC.
- 11. Kathryn Hendrix was the first inside broker on my team, and there was only one other inside broker in the department at the time of Hendrix's promotion.
- 12. I am not aware of anyone in CRC Birmingham's Professional Liability Department who was able to delegate almost all binding, marketing, and quoting to focus solely on generating business within the first 2 years of becoming an inside or associate broker.
- 13. Relationships are important to building and maintaining business. If someone moves into another position on the team, it is important to try and maintain that person's client relationships.
 - 14. 2017 is the only year the Team experienced a decrease in revenue.
- 15. As the Team's revenue has continued to grow, I have hired new members to support the growth.
- 16. A team cannot get approval to hire a new team member unless there is revenue to support it.
- 17. In 2018, the Team's revenue had increased enough to justify bringing on another account executive. Segrest was growing his book and planning for expansion. Tiffany Sanders was

hired to support Segrest's growing book of business and take on Segrest's accounts as Kathryn Hendrix moved into the inside broker position.

- 18. Invitations to a CRC broker retreat are based on broker revenue. For years, I did not have enough revenue to bring anyone with me. Clay Segrest attended the broker retreat in 2018 based on his own revenue. In 2019, I had enough revenue to bring someone with me, and I invited Kathryn Hendrix.
- 19. I did not hire anyone to replace Kathryn Hendrix after she resigned. Everyone on the Team took on Hendrix's responsibilities. Segrest and I assumed the marketing and negotiating tasks Hendrix had taken on as an inside broker.
- 20. The bi-annual bonuses are a large part of CRC's compensation structure. All employees are eligible for and, absent unusual circumstances, are given a bonus twice a year based upon the team's revenue. In all the years I have been at CRC I cannot think of any time where bonuses were not awarded.
- 21. Clay Segrest's bonuses reflected the revenue he brought into the Team that I had nothing to do with. Segrest traveled, developed brand new relationships, and opened new accounts from those new relationships.
- 22. Talsma and Sutton's bonuses reflected their decades-long tenure on the production side of CRC and their tenure on the Team as well as the accounts they serviced.
- 23. Bonuses also account for base pay. Newly hired employees generally have higher base pay. However, more senior employees who were hired in at a lower base pay will be usually given a higher bonus to make up for that difference.

Case 2:21-cv-00300-MHH Document 72-2 Filed 05/30/24 Page 5 of 5

Each year typically August bonuses are more conservative because the Team's 24.

revenue for the year is yet to be determined. Once the final numbers are in for the year, the Team

members receive their February bonuses which is typically larger than the August bonus.

A few months after Hendrix resigned, Rusty Hughes hired a new inside broker, 25.

Paul Burge, who was assigned to Hendrix's cubicle.

The Team has experienced significant growth since 2020. Specifically, the Team 26.

has had a nearly 50% increase in revenue in three years. As we have done in the past, the Team

brought on new members to support the growth and continue to expand.

I declare under penalty of perjury that the foregoing is true and correct.

COREY DAUGHERTY

Date: 5/9/2024 | 2:53 PM CDT